



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 2, 1990

Jan W. Baran, Esquire  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

RE: MUR 2314  
National Republican  
Senatorial Committee and  
James L. Hagen, as treasurer

Dear Mr. Baran:

On August 4, 1987, you were notified that the Federal Election Commission found reason to believe that your clients, the National Republican Senatorial Committee ("NRSC") and its treasurer, had violated 2 U.S.C. §§ 441a(h) and 434(b), and 11 C.F.R. § 110.6(d)(2) in connection with the apparent exercise of direction or control over contributions to Jim Santini for Senate ("Santini Committee") for which the NRSC served as a conduit or intermediary. Then on February 3, 1989, you were notified that the Commission found reason to believe that your clients had violated 2 U.S.C. § 434(b) and 11 C.F.R. § 106.1 in connection with the apparent failure to report contributions made to the Santini Committee in the form of solicitation costs. On May 24, 1989, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe. On July 19, 1989, you were notified that the Commission had declined at that time to enter into conciliation prior to a finding of probable cause to believe.

On October 30, 1990, the Commission reconsidered your request and determined to decline to enter into conciliation prior to a finding of probable cause to believe in MUR 2314. The Commission has concluded that the issues of direction and control and solicitation costs are so related that they should be addressed together rather than separately.

If you have any questions, please contact Elizabeth Campbell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble", is written over a horizontal line.

Lawrence M. Noble  
General Counsel